

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Expanding the Economic and Innovation)	Docket No. 12-268
Opportunities of Spectrum Through Incentive)	
Auctions)	

To The Commission

INITIAL COMMENTS OF THE INCENTIVE AUCTION ADVOCATES

The Incentive Auction Advocates (“IAA”)¹ respectfully submit these comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”)² to conduct voluntary incentive auctions in accordance with Title VI of the Middle Class Tax Relief and Job Creation Act of 2012 (“Spectrum Act”),³ granting the agency authority to repurpose broadcast spectrum for flexible use including new wireless service. IAA believes that any delay in bringing spectrum to market will harm consumers, particularly those in low-income and minority communities who rely on wireless service. Pew studies illustrate that wireless is providing a unique access point for people of color, who are leading mobile Internet adoption.⁴

¹ The Incentive Auction Advocates is a coalition of national organizations created in 2013 to advance the cause of minority ownership in MB Docket No. 02-277 and subsequent dockets (see Appendix). This and all IAA pleadings reflect the institutional views of each of the Incentive Auction Advocates, and are not intended to represent the individual views of each of the Incentive Auction Advocates’ officers, directors and members.

² See Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, Notice of Proposed Rulemaking, 27 FCC Rcd 12357 (rel. Oct. 2, 2012) (“NPRM”).

³ See Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 125 Stat. 156 (2012) (“Spectrum Act”).

⁴ See Aaron Smith, 17% of cell phone owners do most of their online browsing on their phone rather than a computer or other device, Pew Internet & American Life Project (June 26, 2012), p. 5, available at http://pewinternet.org/~media/Files/Reports/2012/PIP_Cell_Phone_Internet_Access.pdf (last visited Dec. 27, 2012) (“2012 Pew Report on Cell Phone Browsing”) (“Roughly two-thirds of [B]lack and Latino cell owners go online using their mobile phones, compared with half of [W]hites.”)

As the Commission develops rules for the forward auction of this unprecedented offering of prime spectrum, the Commission must ensure opportunities for participation by minority and women enterprises in the wireless market to foster competition and viable new entrants. The agency should also prioritize the development of minority ownership and program diversity on all platforms as it performs the reverse auction.

I. TO AVOID SPECTRUM EXHAUST, MORE SPECTRUM MUST COME TO MARKET QUICKLY

By enacting Title VI of the Middle Class Tax Relief and Job Creation Act,⁵ Congress recognized the importance of spectrum and enabled the FCC to reallocate resources to meet the demand for wireless broadband that is rapidly outpacing the current supply.⁶

The forecast for impending spectrum exhaust is grim and the strains of the spectrum crunch are going to be felt in large cities.⁷ The National Broadband Plan predicted the need for

⁵ See Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 125 Stat. 156 (2012) (“Spectrum Act”).

⁶ See, e.g., 158 Cong. Rec. H. 907, H914 (Conf. Rep. on H.R. 3630) (Feb. 17, 2012), (Representative Walden (OR) said, “Spectrum is increasingly becoming the lifeblood of our communications sector and our economy. U.S. investment in 4G wireless networks could range from \$25 to \$53 billion in the next five years, produce \$73 to \$151 billion in GDP, and create 371,000 to 771,000 new jobs, according to a recent study. *But that can’t happen without spectrum, and a spectrum crunch is looming*”) (emphasis added). See also 158 Cong. Rec. S. 888, S888 (Feb. 17, 2012) (Senator Rockefeller (WV) said, “This legislation will also help ease the Nation’s growing spectrum shortage, through the auction of new spectrum to commercial providers.”)

⁷ See, e.g., Jonathan Spalter, As Congress turns attention to federal Spectrum, clearing must be the priority, *The Hill* (Sept. 13, 2012), available at <http://thehill.com/blogs/congress-blog/technology/249259-as-congress-turns-attention-to-federal-spectrum-clearing-must-be-the-priority> (last visited Dec. 21, 2012) (“Thanks to a light regulatory touch, smart secondary market transactions, and increased network efficiency, carriers have been able to manage the looming spectrum crunch and its crippling consequences for consumers. But we cannot delay much longer – with several major cities already feeling its effects, the spectrum crunch may sweep the nation as early as next year.”); Richard Bennett, Relieving the LTE Spectrum Crunch, *ITIF* (Feb. 29, 2012), available at <http://www.innovationfiles.org/relieving-the-lte-spectrum-crunch/> (last visited Dec. 21, 2012).

300 megahertz of wireless spectrum by 2015 to keep up with demand.⁸ In practice, however, the spectrum shortage is approaching at a much faster rate⁹ and the consequences of this deficit could have a far reaching detrimental impact on those who rely most on wireless service: low income and minority consumers.¹⁰ As demand for wireless begins to eclipse supply, consumers will experience higher bills and slower wireless service.¹¹

Aside from higher rates for service, the spectrum crunch will yield additional high costs, including the loss of access to opportunity. As discussed above, African Americans and Hispanics are more likely to use their mobile phones to access the Internet than Whites.¹² Mobile access has allowed a bridge narrowing the digital divide and making information

⁸ See Connecting America: The National Broadband Plan, Federal Communications Commission, (rel. Mar. 16, 2010), p. 84, available at <http://download.broadband.gov/plan/national-broadband-plan.pdf> (last visited Dec. 21, 2012) (“National Broadband Plan”).

⁹ See FCC Staff Technical Paper, Mobile Broadband: The Benefits of Additional Spectrum, p. 18 (Oct. 2010) (“...mobile data demand will exceed available capacity by 2013, and will reach a nearly 300 MHz deficit by 2014.”) See also David Goldman, Sorry, America: Your wireless airwaves are full, *CNN Money* (Feb. 21, 2012), available at http://money.cnn.com/2012/02/21/technology/spectrum_crunch/index.htm?iid=SF_T_Lead (last visited Dec. 26, 2012) (“Feb. 21 Goldman Article”).

¹⁰ See 2012 Pew Report on Cell Phone Browsing at p. 5. While those with higher incomes and more education are more likely than low-income consumers to own smartphones and to generally go online using their phones, households that earn less than \$50,000 a year and have not completed college are likely to conduct the majority of their online activity on cell phones. *Id.* at 6-8. Further, 10 percent of those who conduct the majority of their online activity from their cell phone cite lack of access to a computer or home broadband as a main reason for doing so. *Id.* at 10. See also Kathryn Zickuhr et al., Digital Differences, *Pew Internet & American Life Project* (April 13, 2012), p. 2 available at http://www.pewinternet.org/~media/Files/Reports/2012/PIP_Digital_differences_041312.pdf (last visited Dec. 31, 2012) (“Pew Study on Digital Differences”).

¹¹ See Feb. 21 Goldman Article. See also David Goldman, Why your cell phone bill is going up, *CNN Money* (Feb. 23, 2012), available at http://money.cnn.com/2012/02/23/technology/cell_phone_bill/index.htm?iid=SF_T_River (last visited Dec. 26, 2012).

¹² See Maeve Duggan et al., Cell Phone Activities 2012, *Pew Internet & American Life Project* (Nov. 25, 2012), p.6, available at http://www.pewinternet.org/~media/Files/Reports/2012/PIP_CellActivities_11.25.pdf (last visited Jan. 7, 2013).

available to those with lower incomes and less education, who rely primarily on mobile for Internet access.¹³ To avoid reversing the beneficial impact that the “Minority Wireless Miracle”¹⁴ has had on closing the digital divide, the Commission should bring more spectrum to market promptly.

II. DIVERSE PARTICIPATION SHOULD BE A PRIMARY GOAL OF THE FORWARD AUCTION

A. The FCC Should Adopt An Eligible Entities Definition That Will Advance Minority Ownership

Industry stakeholders, the courts, and the legislature are keeping a watchful eye on the Commission as it takes its first steps into this next regulatory paradigm to win what Chairman Genachowski has called the “global bandwidth race.”¹⁵ As this proceeding becomes a tutorial on how to structure spectrum policy, the civil rights community will be watching to see whether the Commission will finally correct regulatory mistakes of the past to ensure that the broadband

¹³ “Groups that have traditionally been on the other side of the digital divide in basic internet access are using wireless connections to go online. Among smartphone owners, young adults, minorities, those with no college experience, and those with lower household income levels are more likely than other groups to say that their phone is their main source of internet access.” Pew Study on Digital Differences at 2. “Even beyond smartphones, *both African Americans and English-speaking Latinos are as likely as [W]hites to own any sort of mobile phone*, and are more likely to use their phones for a wider range of activities.” *Id.* at 3. See also John B. Horrigan, Recent Tech Adoption Trends and Implications for the Digital Divide, Joint Center for Political & Economic Studies (Aug. 2012), p. 10-11, 17-18, available at <http://www.jointcenter.org/sites/default/files/upload/research/files/Recent%20Tech%20Adoption%20Trends%20and%20Implications%20for%20the%20Digital%20Divide.pdf> (last visited Jan. 7, 2013) (concluding that Smartphones play an important role in expanding broadband access, its benefits are more limited than home broadband).

¹⁴ MMTC coined this term to describe “the relative affordability of mobile wireless broadband use versus costs for home broadband use.” See David Honig, “How to Alleviate the Spectrum Shortage,” Address delivered at the World Conference of Mayors, Tuskegee, AL, May 18, 2012 (available from undersigned counsel).

¹⁵ NPRM, 27 FCC Rcd at 12546 (Statement of Chairman Julius Genachowski) (“In this flat, competitive world, capital and talent can flow anywhere. We’re in a global bandwidth race. It’s similar to the space race in that success will unleash waves of innovation that will go a long way towards determining who leads our global economy in the 21st century.”)

market does not evolve to reflect the low level of minority participation in the broadcast industry.¹⁶

The courts are also interested in how the Commission is handling diversity. Recent court decisions are highly critical of the Commission's failure to address the impact of rule and policy changes on minority ownership. In the wireless auction context, the Third Circuit recently found "serious" deficiencies in the Commission's notice and comment process that led them to vacate two of the most egregious 2006 Designated Entity (DE) rule changes: the 50% impermissible material relationship rule, and the 10-year unjust enrichment rule.¹⁷

Despite the court's ruling and the Commission's subsequent removal of the vacated rule changes, grave damage has already been done. The rule changes negatively impacted DE's ability to raise capital and compete in two of the largest spectrum auctions ever held.¹⁸

Furthermore, the inability of new entrant DEs to compete successfully at auction removed a potential source of new service providers in underserved and unserved communities. DEs are

¹⁶ The communications industry is deeply reflective of our nation's social struggles that were present at that formation of the broadcast industry and have since been woven into the fabric of the industry through late entry and persistent barriers. *See, e.g.* Antoinette Cook Bush and Marc S. Martin, The FCC's Minority Ownership Policies from Broadcasting to PCS, 48 Fed. Comm. L.J. 434, 439 (1996); MMTTC Radio Rescue Petition for Rulemaking, Review of Technical Policies and Rules Presenting Obstacles to Implementation of Section 307(b) of the Communications Act and to the Promotion of Diversity and Localism, MB Docket No. 09-42 (July 19, 2009), p. 4, available at <http://mmtconline.org/lp-pdf/MMTC-Radio-Rescue-Petition-071909-REV.pdf> (last visited Nov. 19, 2012) ("Minority groups were not allowed into broadcasting until two generations after the industry was born. As a result of this late entry, minorities were often able to acquire only those stations with inferior technical parameters and exurban site locations."); United States Government Accountability Office, Report to the Chairman, Subcommittee on Telecommunications and the Internet, Committee on Energy and Commerce, House of Representatives, Media Ownership: Economic Factors Influence the Number of Media Outlets in Local Markets, While Ownership by Minorities and Women Appears Limited and Is Difficult to Assess (March 2008), p. 23-26, available at <http://www.gao.gov/assets/280/273671.pdf> (last visited Jan. 9, 2013).

¹⁷ *See Council Tree Communications Inc. v. FCC*, 619 F.3d 235, 258 (3d Cir. 2010) ("Council Tree").

¹⁸ *See* Initial Comments of the Broadband Diversity Supporters, National Broadband Plan for Our Future, GN Docket No. 09-51 (July 5, 2009), p. 19.

more likely to serve areas where they can readily gain subscribers while not competing head-to-head with the enormous advertising and marketing budgets of large incumbent providers. While the rule modifications were in effect, the aggregate dollar value of licenses won by DEs in two highly significant Auctions, #66 and #73, dropped from an average of 70% in previous auctions to 4% and 2.6%, respectively.¹⁹

Coming at the same time as the free-fall of minority ownership in broadcasting,²⁰ this spectrum incentive auction may be the last opportunity for new entrants in communications to

¹⁹ See Council Tree, 619 F.3d at 248; see also Implementation of the Commercial Spectrum Enhancement Act and Modernization of the Commission's Competitive Bidding Rules and Procedures, Order, 27 FCC Rcd 908, 909 ¶3 (2012) (implementing the court's mandate to vacate two of the impermissible rule changes). A Statement by then-Commissioner Jonathan Adelstein reported that "women-owned bidders failed to win any licenses and minority-owned bidders won less than one percent of licenses (7 of 1,090 licenses, or .64%) despite the fact that women constitute over half the U.S. population and minorities around one-third of the U.S. population. *Commissioner Jonathan S. Adelstein Comments on Lack of Diversity Among Winners of the 700 MHz Auction*, FCC News Release (Mar. 20, 2008). Reviewing the abysmal results of Auction 73, Commissioner Adelstein lamented that, "It's appalling that women and minorities were virtually shut out of this monumental auction. It's an outrage that we've failed to counter the legacy of discrimination that has kept women and minorities from owning their fair share of the spectrum. Here we had an enormous opportunity to open the airwaves to a new generation that reflects the diversity of America, and instead we just made a bad situation even worse. This gives whole new meaning to 'white spaces' in the spectrum." Id.

²⁰ The court has also criticized the Commission's lack of attention to diversity in the broadcast ownership context. In Prometheus Radio Project v. FCC, 373 F.3d 372 (3d Cir. 2004) ("Prometheus I"), the court found that the Commission's repeal of the failed station solicitation rule, without acknowledging that the purpose of the rule was to promote minority ownership, and without discussing the decline in minority ownership or examining the impact the rule change would have on minority ownership, was arbitrary and capricious. Id. at 420-421. "By failing to mention anything about the effect this change would have on potential minority station owners, the Commission has not provided 'a reasoned analysis indicating that prior policies and standards are being deliberately changed, not casually ignored.' Furthermore, while the Commission had promised in 1999 to 'expand opportunities for minorities and women to enter the broadcast industry,' the FSSR remained its only policy specifically aimed at fostering minority television station ownership. In repealing the FSSR without any discussion of the effect of its decision on minority television station ownership (and without ever acknowledging the decline in minority station ownership notwithstanding the FSSR), the Commission 'entirely failed to consider an important aspect of the problem,' and this amounts to arbitrary and capricious rulemaking." Id. (internal citations omitted). Seven years later, the same court expressed its frustration with the Commission's lack of progress on diversity proposals and continued failure to create a defensible definition for eligible entities by vacating the arbitrary and capricious eligible entities definition, remanding the initiatives that relied on the definition,

secure spectrum and provide competition to incumbent providers – large and small. Protecting against the replication of this unfortunate result is essential to the Commissions mandate to “ensure that small businesses...and businesses owned by members of minority groups and women are given the opportunity to participate in the provision of spectrum-based services.”²¹

To ensure that DEs are able to fully participate in the incentive auctions and to prevent the structural exclusion of diversity in telecommunications licensing, the Commission should consider a DE plan that restores bidding credits to the 40% levels used in pre-2006 auctions, and examine the desirability of requesting, from Congress, authority to conduct closed DE auctions should they prove necessary to restore diversity in spectrum ownership.²²

B. The Commission Should Seek Comment On The Overcoming Disadvantages Preference

In 2010, the Commission’s Advisory Committee on Diversity adopted a recommendation to implement a race- and gender-neutral preference for overcoming disadvantages, aptly titled the Overcoming Disadvantage Preference (ODP).²³ In response, the Commission issued a Public

and retaining jurisdiction over remanded issues. See Prometheus Radio Project v. FCC, 652 F.3d 431, 440, 466, 472 (3d Cir. 2011) (“Prometheus II”) (explaining that in Prometheus I, the court ordered the Commission to consider diversity initiatives when it considered the remanded media ownership rules and the court upheld certain rules with the understanding that the Commission would have developed an appropriate definition of SDB). “In upholding the transfer rule, however, we “anticipate[d]... that by the next quadrennial review the Commission will have the benefit of a stable definition of SDBs, as well as several years of implementation experience, to help it reevaluate whether an SDB-based waiver will better promote the Commission’s diversity objectives” than the small business definition it used in the rule.” Id. at 440 (citing Prometheus I at 427-428 n.70).

²¹ NPRM at ¶293 (citing 47 U.S.C. §309(j)(4)(D)).

²² Section 6404 of the Spectrum Act provides that the Commission “may not prevent a person from participating system of competitive bidding under this subsection if such person” meets all of the general qualifications. Consequently, if set-asides prove necessary, Congress would need to mandate them.

²³ This proposal, unanimously adopted by the Diversity Committee can be found on its webpage at <http://transition.fcc.gov/DiversityFAC/meeting101410.html> (then follow link to “Recommendation on Preference for Overcoming Disadvantage”) (last visited Dec. 19, 2012) (“ODP Recommendation”). ODP was designed to help the agency be responsive to the Third Circuit’s mandate in Prometheus II to develop a “long-awaited” and “workable” socially and

Notice requesting comment on the proposal but has since taken no further action.²⁴ To preserve its ability to craft auctions rules that meet the requirements of §309(j)(3), we urge the Commission to issue a Further NPRM to seek comment on how to implement and administer ODP, rather than bootstrapping, from these IAA Comments, of notice to other parties of the potential desirability of ODP.²⁵ A Further NPRM should identify the specific operational and practical questions to which the Commission wants guidance. Some of these questions might be:

1. What qualifies as a disadvantage and how is one weighed against another?
2. How would an applicant document a showing of disadvantage?
3. How should the Commission evaluate the extent to which an applicant has overcome a disadvantage?
4. How much credit should be awarded for an overcoming disadvantage preference?
5. How should the preference be applied to corporate applicants?
6. Should the preference be awarded well in advance of an auction, thereby enabling it to be used by eligible entities to help attract investment capital?
7. How and when could a third party challenge an entity's eligibility for the preference, and how would the Commission adjudicate such a challenge and design a remedy if the challenge has merit?

economically disadvantaged businesses ("SDB") definition. See Prometheus II, 652 F.3d at 466, 471-72 (vacating and remanding the previous Diversity Order so that the Commission "may justify or modify its approach to advancing broadcast ownership by minorities and women during its 2010 Quadrennial Review").

²⁴ See Media and Wireless Telecommunications Bureaus Seek Comment on Recommendation of the Advisory Committee on Diversity for Communications in the Digital Age for a New Auction Preference for Overcoming Disadvantage, Public Notice, 25 FCC Rcd 16854 (rel. Dec. 2, 2010).

²⁵ See Council Tree, 619 F.3d at 254-55 (citing Shell Oil Co. v. EPA, 950 F.2d 741, 751 (D.C. Cir. 1991) ("an unexpressed intention cannot convert a final rule into a 'logical outgrowth' that the public should have anticipated.")) See also Letter From David Honig, MMTC, to Gary Epstein, Senior Advisor to the Chairman, Federal Communications Commission, et. al, re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions (filed Nov. 26, 2012) (explaining why the agency's failure to reference the ODP proposal should be corrected through the release of a supplement to the NPRM to comply with the notice and comment requirements of Section 309(j)). "By failing to specifically mention the ODP proposal as it seeks comment from the public, the Commission may disable itself from building the record necessary to craft new auction rules that comply with 309(j) directives to ensure that minority and women-owned businesses have an opportunity to compete for spectrum licenses." Id.

IAA is mindful that with any new paradigm, and especially one based on individualized assessments, administrative guidelines are needed to ensure that the design meets the stated goals of the program, minimizes the possibility of abuse, and limits subjectivity. These are not insurmountable obstacles: every system of personnel management or university admissions faces similar operational questions. Gaining an understanding of how ODP could operate in the context of wireless licensing is essential to successful application of ODP to auctions.

III. THE COMMISSION SHOULD PRIORITIZE MINORITY OWNERSHIP AND PROGRAM DIVERSITY IN THE REVERSE AUCTION

During the 17-year span of the Commission's successful tax certificate policy,²⁶ which incentivized minority ownership by allowing companies to defer capital gains tax on the sale of media properties to minorities, minority broadcast ownership quintupled.²⁷ In 2011, the Commission recommended Congress implement new tax incentive legislation under which Congress would authorize the Commission to resume the issuance of tax certificates to incentivize the sale of media or telecom assets to eligible entities, including minorities and women.²⁸

²⁶ The Tax Certificate Policy was adopted by the Commission in 1978 and repealed by Congress in 1995. See Supplemental Comments of the Diversity and Competition Supporters in Response to the Notice of Proposed Rulemaking, 2010 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 09-182 et al. (Apr. 3, 2012), p. 10.

²⁷ See id. (citing Catherine J.K. Sandoval et al., Minority Commercial Radio Ownership in 2009: FCC Licensing and Consolidation Policies, Entry Windows, and the Nexus Between Ownership, Diversity and Service in the Public Interest (2009) at p. 14, available at http://mmtconline.org/lp-pdf/Minority_Commercial_Radio_Broadcasters_Sandoval%20MMTC_2009_final_report.pdf (last visited Jan. 11, 2013).

²⁸ See Section 257 Triennial Report to Congress, Identifying and Eliminating Market Entry Barriers, For Entrepreneurs and Other, Small Businesses, Report, 26 FCC Rcd 2909, 2965 ¶155 (2011) ("We propose that Congress adopt a new tax incentive program that would authorize the provision of tax advantages to eligible companies involved in the sale of communications businesses to small firms, including those owned by women and minorities. The proposed program could permit deferral of the taxes on any capital gain involved in such a transaction, as long as that gain is reinvested in one or more qualifying communications businesses. The

The tax certificate concept is a time-tested, effective template for promoting program diversity. This concept can be put to use as a means of preserving program diversity as many minority owned television broadcasters yield up their spectrum to be auctioned. In particular, the Commission should consider recommending to Congress that it authorize the issuance of tax certificates to television broadcasters who tender their spectrum for reverse auction if the broadcasters continue to offer their program streams on other platforms – e.g., on another station’s digital sub-channel, on cable, via satellite, or online. This step could do much to ensure that the public will continue to enjoy the diverse program content offered by minority owned broadcasters, and help ensure that the next generation of wireless communications will be a platform for minority digital entrepreneurs and a safe harbor for affordable and accessible service to all consumers.

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proposed program could also permit tax credits for sellers of communications properties who offer financing to small firms. Additional conditions might include restrictions on the size of the eligible purchasing firm, a minimum holding period for the purchased firm, and a cap on the total value of eligible transactions. The provision of tax advantages has proven to encourage the diversification of ownership and to provide opportunities for entry into the communications industry for small businesses, including disadvantaged businesses and businesses owned by minorities and women.”)

APPENDIX

THE INCENTIVE AUCTION ADVOCATES (IAA)

- 1. A. Philip Randolph Institute**
- 2. Asian Pacific American Media Coalition**
- 3. American Indians in Film and Television**
- 4. Black College Communication Association**
- 5. Black Entertainment and Sports Lawyers Association**
- 6. Black Leadership Forum**
- 7. Broadband & Social Justice**
- 8. Communications Consumers United**
- 9. Dialogue on Diversity**
- 10. Hispanic Elected Local Officials**
- 11. International Black Broadcasters Association**
- 12. Japanese American Citizens League**
- 13. League of United Latin American Citizens**
- 14. MANA – A National Latina Organization**
- 15. Minority Media and Telecommunications Council**
- 16. National Association of Black County Officials**
- 17. National Association of Black School Educators**
- 18. National Association of Black Telecommunications Professionals**
- 19. National Association of Multicultural Digital Entrepreneurs**
- 20. National Black Caucus of Local Elected Officials**
- 21. National Black Caucus of State Legislators**
- 22. National Black Chamber of Commerce**
- 23. National Black Church Initiative**
- 24. National Black Religious Broadcasters**
- 25. National Conference of Black Mayors**
- 26. National Congress of Black Women, Inc.**
- 27. National Council of Negro Women**
- 28. National Hispanic Federation for the Arts**
- 29. National Indian Telecommunications Institute**
- 30. National Newspaper Publishers Association**
- 31. National Organization of Black Elected Legislative Women**
- 32. National Puerto Rican Chamber of Commerce**
- 33. Rainbow PUSH Coalition**
- 34. Universal Impact**
- 35. Vision Maker Media (formerly Native American Public Telecommunications)**
- 36. Women’s Institute for Freedom of the Press**